

KEITH D. KARNES, OSB # 033521
keith@rankkarneslaw.com
Rank & Karnes Law, P.C.
2701 12th St. S.E.
Salem, OR 97302
Tel: (503) 385-8888
Fax: (503)385-8899
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JOHN HUNSAKER et al.

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 6:16-cv-00386-MC

MOTION FOR EXTENSION

Pursuant to LR 7.1 the parties have conferred and defendant does not oppose this motion.

Plaintiffs hereby move the Court for an extension of 14 days to submit their reply to the United States of America's Response in Opposition of Plaintiffs' Motion for Attorney Fees and Costs. Plaintiffs' counsel is out of the country until September 3, 2019 and has been unable to reply to defendant's response.

Wherefore, plaintiffs request that the Court grant until September 10, 2019 to submit their reply to United States of America's Response in Opposition of Plaintiffs' Motion for Attorney Fees and Costs.

Dated: August 26, 2019

RESPECTFULLY FILED,

/s/ Keith D. Karnes
Keith D. Karnes, OSB No. 033521
Attorney for Plaintiffs
Rank & Karnes Law, P.C.
2701 12th St. S.E.
Salem, Oregon 97302
keith@rankkarneslaw.com
(503) 385-8888

CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I filed the foregoing document via ECF which will in turn serve:

Keith D. Karnes keith@rankkarneslaw.com, 9982680420@filings.docketbird.com,
jacob@rankkarneslaw.com

Boris Kukso boris.kukso@usdoj.gov, western.taxcivil@usdoj.gov

Yael Bortnick Yael.Bortnick@usdoj.gov, western.taxcivil@usdoj.gov

Dated: August 26, 2019

/s/ Keith D. Karnes
Keith D. Karnes, OSB No. 033521